

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION**

**ALICIA INGRAM**

**PLAINTIFF**

**VS.**

**CASE NO. \_\_\_\_\_**

**MVT SERVICES, LLC,  
and OSORINO SALVADOR**

**DEFENDANTS**

**COMPLAINT**

Comes now the Plaintiff, Alicia Ingram, by and through her counsel, Lloyd W. “Tre” Kitchens of The Brad Hendricks Law Firm, and for her Complaint states:

1. Plaintiff is an individual resident of Milwaukee, Wisconsin.
2. Defendant MVT Services, LLC is a national over the road trucking company, using the roads of the State of Arkansas. Service may be obtained by serving the agent for service of process Ms. Trish Grim, MVT Services, LLC, 3590 West Picacho Avenue, Las Cruces, NM 88007.
3. Upon information and belief, defendant Salvador is a citizen of the country of Mexico. Mr. Salvador is an employee of MVT Services, LLC and his negligence is imputed to MVT via the theory or *respondeat superior*.
4. The events complained of herein occurred in Nevada County, Arkansas. This Court is the proper jurisdiction and venue to hear this matter.
5. On or about April 30, 2019, the Plaintiff was sleeping in the sleeping compartment of an 18 wheeler at a Love’s truck stop in Prescott, Arkansas, when an 18 wheeler

owned by the Defendant negligently ran into the 18 wheeler the Plaintiff was in, proximately causing her injuries.

6. Defendants' negligence includes but is not limited to:

- a. Failure to keep a lookout;
- b. Failure to yield; and
- c. Otherwise failing to exercise ordinary care.

7. As a proximate result of the Defendants' negligence, the Plaintiff suffered painful personal injuries, incurred medical bills, emotional distress, and other out of pocket expenses.

WHEREFORE, Plaintiff prays for a judgment against the Defendants, jointly and severally, in an amount sufficient to compensate her for her damages, in excess of the minimum amount for Federal Diversity of Citizenship cases (\$75,000) and for all other just and proper relief.

Respectfully Submitted,

**THE BRAD HENDRICKS LAW FIRM**

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